

FILED

1 Name: LAWRENCE McDavid

2 Address: 9163 SANTA MONICA Blvd 571
BEVERLY HILL, CA 90210

3 Phone: _____

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5 In Pro Per

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8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 LAWRENCE McDavid

11 Plaintiff

12 Ralphs Corp.

13 Defendant(s).

14 CASE NUMBER:
SACV16-00205 DOC JCG

15 To be supplied by the Clerk of
The United States District Court

16 **Complaint**

1 ON Feb 5th ²⁰¹⁵ BETWEEN 12:45 pm to 1:45 pm plaintiff ENTERED A Ralph's in the
 2 city of SAN JUAN Capistrano to make a purchase in the deli department
 3 of store, as plaintiff was waiting to be called next by a Ralph deli employee
 4 working behind the deli counter, serving the customer in front of plaintiff
 5 Ralph's deli EMPLOYEE DOE #1 said to plaintiff in a loud voice, hey !! why ARE
 6 SCARING my neighbor, plaintiff RESPONDED by SAYING EXCUSE ME? to which
 7 Ralph deli EMPLOYEE responded by REPEATING HERSELF AGAIN by SAYING why ARE you
 8 COMING AROUND SCARING MY NEIGHBOR, you SCARING HER, SHE'S AFRAID OF YOU, to
 9 which plaintiff RESPONDED, EXCUSE ME, I don't know who you are talking
 10 about, to which Ralph deli EMPLOYEE DOE #1 RESPONDED, THE WOMAN WITH
 11 THE BLONDE HAIR, plaintiff RESPONDED what WOMAN WITH BLONDE HAIR, to which the
 12 Ralph's deli EMPLOYEE DOE #1 RESPONDED THE WHITE LADY WITH BLONDE, WHO DRIVES
 13 A WHITE CAR & LIVES ON MILLPOND, SHE MY NEIGHBOR, why ARE YOU SCARING
 14 HER, Ralph deli EMPLOYEE DOE #1 said she lived on ^{MARINE OR} OCEAN St next to this
 15 lady with blonde hair, at the time Ralph deli EMPLOYEE DOE #1 is SAYING this
 16 IN A VERY LOUD VOICE, THERE WERE THREE WHITE WOMEN & ONE WHITE GENTAL
 17 MAN STANDING AROUND ME AND THE DELI COUNTER, AND ONE OF THE THREE WHITE
 18 WOMEN A Ralph's deli EMPLOYEE DOE #2 WHO HAPPENED TO BE STANDING NEXT TO
 19 THE Ralph's deli EMPLOYEE MAKING THESE LOUD STATEMENTS TO plaintiff IN THE
 20 STORE WITHIN EAR SHOT OF OTHER CUSTOMERS WHO CLEARLY HEARD & WERE
 21 STANDING, AND STARING AT plaintiff IN A VERY UNCOMFORTABLE WAY, AS THE
 22 Ralph's deli EMPLOYEE WAS MAKING THESE LOUD AND EMBARRASSING STATE-
 23 MENT ABOUT plaintiff FOR EVERYONE TO HEAR, SPREADING INFORMATION
 24 ABOUT plaintiff PERSON BUSINESS THAT WAS NOT HER TO TELL, WHILE ACTING
 25 IN THE SCOPE AS AN EMPLOYEE, AGENT, ACTOR, OR SERVANT OF HER EMPLOY-
 26 MENT, OR WHILE WORKING ON THE CLOCK IN THE SCOPE OF PERFORMING HER
 27 DUTIES BEHIND Ralph deli COUNTER BETWEEN 12:45 TO 1:45 WHILE IN
 28 A Ralph UNIFORM WITH THE NAME OF Ralph, THEREBY REPRESENTING AS A

1 EMPLOYEE, OR AGENT of Ralph's, within Ralph place of business, performing
 2 her job description & dutie set forth by Ralph, as a result plaintiff has
 3 suffered, the embarrassment within the community of SAN JUAN,
 4 BEING SHUNNED publicly by those who use to speck, stares, whispering
 5 plaintiff quickly left the store and has NEVER RETURNED to embarrassed
 6 to go in, as going to Ralph's has ruined my reputation which this
 7 community, SAN JUAN is a very small community, where gossip &
 8 word travel fast whether real or imagined, when plaintiff goes into
 9 store people are looking at plaintiff in ways that are not inviting
 10 this is the result of Ralph's deli EMPLOYEE Doe #1 while working in the
 11 scope of her employment within Ralph business and carry out
 12 the business of Ralph's, that plaintiff has no other recourse
 13 but to bring/file this Lawsuit, for Defamation/Slander
 14 for destroying plaintiff's Right to (Privacy), and to bring the
 15 Lawsuit under the Doctrine of Respondent Superior & Negligi-
 16 ence, that Ralph deli EMPLOYEE, word spoken from Doe #1 was
 17 defamatory citing Brown v. Colonial Store 101 GA App 154 (1964)
 18 seeking a jury trial, asking for punitive, compensatory, of
 19 \$5,000,000 EACH

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 A handwritten signature in black ink, appearing to read "Lawrence M. Davis" followed by the date "Feb 5, 2016".